

RETURN DATE - DECEMBER 28, 2016

SUPERIOR COURT

BABA REALTY, LLC

HOUSING SESSION

V.

AT HARTFORD

ANGELIZ NIEVES and NOREIDA RIVERA

DECEMBER 14, 2016

COMPLAINT

The plaintiff, Baba Realty, LLC (the "Plaintiff"), through its attorney, complains of the defendants, Angeliz Nieves and Noreida Rivera (the "Defendants"), as follows:

FIRST COUNT (Nonpayment of Rent)

1. On or about October 1, 2015, the Plaintiff as lessor/landlord, and the Defendants as lessees/tenants, entered into a written lease for the use and occupancy of the apartment premises located at 40 Hillside Street - Unit B20, East Hartford, Connecticut.
2. During the term of the lease, the Defendants agreed to pay a monthly rental of \$1,000.00, payable on the first calendar day of each month.
3. The Defendants took possession of the premises pursuant to the lease, and still occupy the premises.
4. After moving in, the Defendants then failed to pay the agreed upon rent for the months of August, September, October, and November of 2016 and have also failed to make any use and occupancy payments.
5. On December 6, 2016, the Plaintiff caused a Notice to Quit Possession to be served on the Defendants to vacate the premises on or before December 13, 2016, as required by law. The original Notice to Quit Possession with State Marshal's return is attached hereto.
6. Although the time given in the Notice to Quit Possession has passed, the Defendants still continue in possession.

SECOND COUNT (Right or Privilege to Occupy has Terminated)

1. The Plaintiff is the owner of apartment premises located at 40 Hillside Street - Unit B20, East Hartford, Connecticut.
2. The Defendants are in possession of the apartment premises located at 40 Hillside Street - Unit B20, East Hartford, Connecticut.

3. Whatever right or privilege the Defendants had to occupy the apartment premises located at 40 Hillside Street - Unit B20, East Hartford, Connecticut is terminated.
4. On December 6, 2016, the Plaintiff caused a Notice to Quit Possession to be served on the Defendants to vacate the premises on or before December 13, 2016, as required by law. The original Notice to Quit Possession with State Marshal's return is attached hereto.
5. Although the time given in the Notice to Quit Possession has passed, the Defendants still continue in possession.

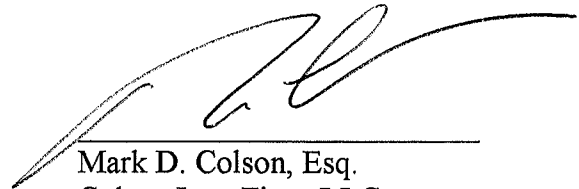
THIRD COUNT (Never Had Right or Privilege)

1. On or around October 1, 2015, the Defendants took possession of the apartment premises located at 40 Hillside Street - Unit B20, East Hartford, Connecticut, without the knowledge and/or acquiescence of the Plaintiff.
2. The Defendants never had the right or privilege to occupy the apartment premises.
3. On December 6, 2016, the Plaintiff caused a Notice to Quit Possession to be served on the Defendants to vacate the premises on or before December 13, 2016, as required by law. The original Notice to Quit Possession with State Marshal's return is attached hereto.
4. Although the time given in the Notice to Quit Possession has passed, the Defendants still continue in possession.

WHEREFORE, the Plaintiffs claim:

1. Judgment for immediate possession of the premises; and/or
2. Any and all other equitable relief in accordance with the claims of the Plaintiff, as the Court deems appropriate.

BABA REALTY, LLC



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